

Hand Deliver

December 7, 2006

In reply refer to SHEA-104621



Mr. Stephen Baxter, PE
Senior Hazardous Waste Engineer
Southern California Permitting and Corrective Action Branch
Department of Toxic Substances Control
1011 North Grandview Avenue
Glendale, California 91201

Subject: RCRA Permit Applications for the Santa Susana Field Laboratory
Area I & III Boeing (CAD 093365435) and Area II NASA
(CA1800090010)

Dear Mr. Baxter:

Transmitted herewith are RCRA Permit Applications for the Santa Susana Field Laboratory Area I & III Boeing (CAD 093365435) and Area II NASA (CA1800090010). This transmittal includes:

- Two copies of the Area I & III RCRA Post Closure Permit for the five closed surface impoundments in Areas I & III, including revised Part A and Part B applications.
- Two copies of the Area I RCRA Hazardous Waste Facility Permit for the WS-05 UV/H₂O₂ Treatment System, including revised Part A and Part B applications.
- Two copies of the Area II RCRA Post Closure Permit for the four closed surface impoundments in Area II, including revised Part A and Part B applications.
- Two copies of the Area II RCRA Hazardous Waste Facility Permit for the Delta Treatment System, including revised Part A and Part B applications.

As indicated in Boeing's Response to NOD dated July 17, 2006, these permit applications have been modified to:

1. Conform with DTSC requests to include separate Part A & Part B applications for each of the 4 permits, separating the post closure activities from the waste facility (groundwater treatment) activities.
2. Restructure the permit applications in a format following suggestions in the specific comments presented in the Department's Notice of Deficiency

(NOD) dated April 17, 2006, including providing appropriate references, summarizing portions of supporting reports, and appending supporting documentation, where appropriate.

3. Provide Waste Analysis Plans (WAPs) that satisfy regulatory requirements.
4. Revised figures and illustrations.
5. Include information on the resolution or partial resolution of the outstanding items, including the proposed Article 6 groundwater monitoring program, and deed notification requirements for NASA closed surface impoundments.



Please note that Boeing/NASA is submitting permit applications for two of the eight existing treatment systems at the Santa Susana Field Laboratory. The two systems for which applications are being submitted (WS-05 and Delta) are to maintain pumping and treatment capacity while we pursue a new groundwater treatment system under the Permit by Rule (PBR) tier of California's Tier Permitting process. As we discussed, the Closure Plans for the Delta and WS-05 Treatment facilities present an approach to closure that satisfies the content requirements of the regulations, and will provide the framework for a consistent approach to closure plan approval of all eight treatment systems.

Boeing appreciates the Department's assistance and guidance in the preparation of these permit applications. If you should have any questions, or wish further discussion of the permit applications, please contact me at (818) 466-8795.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Art Lenox'.

Art Lenox
Environmental Remediation

Enclosure:

- The Area I & III RCRA Post Closure Permit for the five closed surface impoundments in Areas I & III, including revised Part A and Part B applications
- The Area I RCRA Hazardous Waste Facility Permit for the WS-05 UV/H₂O₂ Treatment System, including revised Part A and Part B applications

- The Area II RCRA Post Closure Permit for the four closed surface impoundments in Area II, including revised Part A and Part B applications
- The Area II RCRA Hazardous Waste Facility Permit for the Delta Treatment System, including revised Part A and Part B applications

cc:

Allen Elliott, NASA	(with enclosures)
Jose Kou, DTSC	(w/o enclosures)
James Pappas, DTSC	(w/o enclosures)
Tom Seckington, DTSC	(with enclosures)
Gerard Abrams, DTSC	(with enclosures)

